

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Stephen Gill, )  
Plaintiff(s), )  
v. ) Civil Action No. 1:25-cv-10527-MJJ  
Northern Essex Community College, )  
Defendant(s). )

[JOINT PROPOSED] SCHEDULING ORDER

In accordance with Federal Rule of Civil Procedure 26(f) and Civil Local Rule 16.1, Plaintiff Stephen Gill and Defendant Northern Essex Community College have met and conferred, and hereby submit this Scheduling and Case Management Order to the Court. The parties have agreed on (all/most) provisions of this Proposed Order. (The limited areas where the parties have differing positions are noted, and each side has included a brief explanation of their respective positions. In summary, the areas of remaining dispute are):

- 1. Initial Disclosures.** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) and by this Court's Notice of Scheduling Conference must be completed by August 4, 2025.
  - 2. Amendments to Pleadings.** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after August 11, 2025.
  - 3. Fact Discovery – Interim Deadlines.**
    - a. All requests for production of documents and interrogatories must be served by November 28, 2025.
    - b. All requests for admission must be served by January 9, 2026.

- c. All depositions, other than expert depositions, must be completed by February 13, 2026.
4. **Obligation to Supplement.** Supplemental disclosures under Fed. R. Civ. P. 26(e) shall be made promptly after the receipt of information by the party or counsel and, in any event, no later than the completion of fact discovery, unless good reason can be shown for why such information was not available.
5. **Final Fact Discovery Deadline.** All discovery, other than expert discovery, must be completed by February 15, 2026.
6. **Status Conference.** A status conference will be held set by the Court. Prior to that time, the parties shall file a status report indicating the current status of the case, including whether the parties intend to seek expert discovery and/or intend to file any dispositive motions, whether the parties are interested in mediation, as well as any other matter relevant to the progress of the case.
7. **Expert Discovery.**
  - a. Trial experts for the party with the burden of proof must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by April 1, 2026.
  - b. Rebuttal trial experts must be designated, and the information contemplated by Fed. R. Civ. P. 26(a)(2) must be disclosed, by May 1, 2026.
  - c. All trial experts must be deposed by June 1, 2026.
8. **Summary Judgment Motions.**
  - a. Motions for summary judgment must be filed by March 27, 2026.
  - b. Opposition to summary judgment motions are due twenty-one (21) days thereafter.
  - c. Reply memoranda are due within fourteen (14) days of the filing of the opposition.
  - d. Sur-reply memoranda are not permitted.
  - e. In the case of cross-motions, the deadlines and page limits for the filings other than the Plaintiff's initial motion are set forth in the Session's Standing Order Regarding Motion Practice in Section D(2) unless specifically modified.
9. **Trial.** The parties will be ready for trial on a date set by the Court.

NORTHERN ESSEX COMMUNITY  
COLLEGE,

By Its Attorneys,

ANDREA JOY CAMPBELL  
ATTORNEY GENERAL

/s/ Patrick C. Cento

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Plaintiff,

By his Attorney,

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#### CERTIFICATION

I certify that I have filed and served via ECF on all parties of record on this 8th day of July 2025.

/s/ Sonja L. Deyoe  
Sonja L. Deyoe